1		
2		
3		
4		
5		
6	·	
7		The Honorable Ronald B. Leighton
8	WESTERN DISTRI	S DISTRICT COURT CT OF WASHINGTON
9	AT T	CACOMA
10	JUDITH COX and CHARLES COX individually and as Personal	NO. 14-05923RBL
11	Representatives of the Estates of C.J.P. and B.T.P.,	DECLARATION OF PETER J.
12	and D.1.1.,	HELMBERGER IN SUPPORT OF DEFENDANTS' MOTION FOR
13	Plaintiffs,	SUMMARY JUDGMENT
14	v.	
15	STATE OF WASHINGTON, DEPARTMENT OF SOCIAL AND	• .
16	HEALTH SERVICES, FOREST JACOBSON, ROCKY STEPHENSON,	
17	JANE WILSON, and BILLIE REED- LYYSKI,	
18		
19	Defendants.	
20	PETER J. HELMBERGER hereby dec	clares under penalty of perjury under the laws of the
21	state of Washington that the following is true a	and correct:
22	1. I am over the age of 18, com	petent to testify as to the matters stated herein and
23	make this declaration based on my personal	knowledge. I am one of the Assistant Attorneys
24	General assigned to represent the State of Was	shington in this case.
25		
26		
	I	

1	2. Attached to my declaration as Exhibit A is a true and correct copy of the Guardian
2	ad Litem's Report to the Court authored by Julio Serrano, Jr., filed in Pierce County Case Number
3	11-7-01802-8 on January 6, 2012.
4	DATED this 30 th day of July, 2015 in Tacoma, Washington.
5	
6	Melo Melo
7	PETER MELMBERGER, WSBA No. 23041 Assistant Attorney General
8	
9	
10 11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

1	CERTIFICATE OF SERVICE
2	I hereby certify that on this 30 th day of July, 2015, I caused to be electronically filed the
3	foregoing document with the Clerk of the Court using the CM/ECF system which will send
4	notification of such filing to the following:
5	James S. Rogers
6	Elizabeth Donaldson Cheryl Snow
7	Law Offices Of James S. Rogers 1500 Fourth Avenue, Suite 500
8	Seattle, WA 98101 (206) 621-8525
9	jsr@jsrogerslaw.com csnow@jsrogerslaw.com
10	liz@jsrogerslaw.com
11	Anne Bremner Evan Bariault
12	1200 Fifth Avenue, Suite 1900 Seattle, WA 98101
13	(206) 486-8000
14	abremner@freybuck.com ebariault@freybuck.com
15	
16	ROBERT W. FERGUSON Attorney General
17	/s/Peter J. Helmberger
18	PETER J. HELMBERGER, WSBA No. 23041 Assistant Attorney General
19	1250 Pacific Avenue, Suite 105 Tacoma, WA 98401
20	Telephone: (253) 593-5243 FAX: (253) 593-2449
21	E-mail: <u>PeterH@atg.wa.gov</u>
22	<i>/s/Joseph M. Díaz</i> JOSEPH M. DIAZ, WSBA No. 16170
23	Assistant Attorney General 7141 Cleanwater Ln SW
24	Tumwater, WA 98501 Telephone: (360) 586-6300
25	FAX: (360) 586-6655 E-mail: <u>JosephD@atg.wa.gov</u>
26	Attorneys for Defendants